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10 Attorneys for Plaintiff

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA,)	CR No. 08-434 SI
17 Plaintiff,)	
18 v.)	STIPULATION AND PROPOSED ORDER
19 LUIGI FULVIO PALMARES AGUILAR,)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
20 Defendant.)	
21 _____)	

23 On July 3, 2008, the parties in this case appeared before the Court for the defendant's
24 arraignment. At that time, the parties requested, and the Court agreed, to exclude all time under
25 the Speedy Trial Act between July 3, 2008 and August 15, 2008 because defense counsel needs
26 time to review electronic discovery, and also because the attorneys representing both parties are
27 unavailable until that date. The parties represented that granting the continuance was the
28 reasonable time necessary for preparation of defense counsel and continuity of defense counsel

1 and government counsel. 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of
2 justice served by granting such a continuance outweighed the best interests of the public and the
3 defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

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5 SO STIPULATED:

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7 JOSEPH P. RUSSONIELLO
United States Attorney

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9 DATED: July 3, 2008

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_____/s/
TAREK J. HELOU
Assistant United States Attorney

12 DATED: July 3, 2008

_____/s/
GEOFFREY HANSEN
Attorney for Defendant Margaret Pek Hoon Lim

15 For the reasons stated above, the Court finds that exclusion of time from July 3, 2008
16 through August 15, 2008 is warranted and that the ends of justice served by the continuance
17 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161
18 (h)(8)(A). The failure to grant the requested continuance would deny both parties continuity of
19 counsel, and deny the defendant effective preparation of counsel, and would result in a
20 miscarriage of justice. 18 U.S.C. §3161(h)(8)(B)(iv).

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22 SO ORDERED.

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24 DATED: 7/8/08

THE HONORABLE MARIA-ELENA JAMES
United States Magistrate Judge